

## **Exhibit 28**

## Layne Hilton

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**From:** Jessica Heinz <JHeinz@c-wlaw.com>  
**Sent:** Tuesday, December 03, 2019 3:49 PM  
**To:** 'Marlene Goldenberg'  
**Cc:** Valsartan PEC Listserv; 'sgoldberg@duanemorris.com'; Jason M. Reefer; bee.nagle@kirkland.com; AWaleko@duanemorris.com; Blanton, Robert E.; harkinss@gtlaw.com  
**Subject:** RE: RFP Update

Marlene,

I hope you had a nice Thanksgiving!

Following up on our meet-and-confer regarding my clients' custodians, we will agree to add the following to our list:

- Sudhir Bheeminemi (hired by Aurolife on March 10, 2008);
- David Palew (hired by APUSA on July 29, 2013); and
- Venkata Kota (hired by Aurolife on May 3, 2010).

As we discussed, the following people are employed by Aurobindo Pharma Ltd. and, therefore, we will not agree to add them to our custodians list:

- Ram Mohan Rao
- Mahesh Shinde
- Gita Rao
- Dasarathi
- Sarath Kumar Kamavarapu
- Rama Srinivas
- Hemanth Kumar Sharma
- Anupan Dutt

We also will not agree to add the following individuals because they were not actively involved with the products at issue or the recall and/or they are cumulative of other custodians we have already agreed to:

- Sanjay Singh (APUSA Vice President of Operations) – He was not actively involved with the products at issue or the recall.
- Karthikeyan Kumarasamy (former Aurolife Associate Director of Facilities and Engineering) - He left the company on July 27, 2018. He was not actively involved with the products at issue or the recall.
- Srinivasulu Ale (former Aurolife Director of Quality Control) – He left the company on February 9, 2018. He was not actively involved with the products at issue or the recall.
- Amman Aysha (former APUSA Pharmacovigilance Manager) – She was not involved with the products at issue or the recall. She was replaced by Jasleen Gupta.
- Chintal Thakkar – She works in the Regulatory Affairs department and reports to Blessy John. She was not involved with the products at issue or the recall.
- Arpit Patel (former Associate Director of Quality Assurance) – He left the company in 2017. He was not actively involved with the products at issue or the recall.

This brings our agreed-upon list to a total of 13 custodians, including the following:

1. Jeffrey Jackowski
2. Blessy John
3. Daniel Burns

4. Sandra Martinez
5. Bhadresh Doshi
6. Jasleen Gupta
7. Steve Lucas
8. Milind Shirshikar
9. Prasad Gorijavolu
10. Krishna Reddy Chada
11. Sudhir Bheeminemi
12. David Palew
13. Venkata Kota

Regarding Plaintiffs' RFPs, the Defendants received Judge Schneider's email and Adam's response this morning stating that Plaintiffs will amend their requests further. The Defendants currently stand by their objections and amended responses to Plaintiffs' requests. However, in light of the parties' correspondence with the Court, we reserve the right to respond and/or amend further once we receive and review Plaintiffs second amended requests.

Sincerely,  
Jessica

JESSICA M. HEINZ | Partner

## CIPRIANI & WERNER PC

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**From:** Marlene Goldenberg [mailto:mjgoldenberg@goldenberglaw.com]  
**Sent:** Monday, December 02, 2019 5:22 PM  
**To:** Jessica Heinz  
**Cc:** Valsartan PEC Listserv  
**Subject:** Re: RFP Update

Jessica,

It was nice speaking with you Friday, and I hope you had a nice Thanksgiving. I wanted to follow up on our discussion and ask if you will be able to get back to me on the items your side was going to discuss. As you know, we have briefs due soon, so I'd like to do what I can to ensure we are only briefing issues actually in dispute.

As to the Auro custodians, please also let me know where we stand on the individuals you were waiting to hear back on.

Thanks,

Marlene

**Marlene J. Goldenberg • Partner**

**GoldenbergLaw, PLLC**

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**From:** Jessica Heinz <JHeinz@c-wlaw.com>

**Sent:** Friday, November 22, 2019 7:48 AM

**To:** Marlene Goldenberg

**Cc:** Valsartan PEC Listserv

**Subject:** RE: RFP Update

Hi Marlene,

I'm sorry. I misunderstood your first email. I have to speak with Co-defendants' counsel before I commit to a date and time. I will discuss with them today.

Best regards,

Jessica

**JESSICA M. HEINZ** | Partner

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**From:** Marlene Goldenberg [mailto:mjgoldenberg@goldenberglaw.com]

**Sent:** Thursday, November 21, 2019 1:53 PM

**To:** Jessica Heinz

**Cc:** Valsartan PEC Listserv

**Subject:** Re: RFP Update

**No- this is meant to cover the RFPs to which you and I were both assigned so that we can hopefully reach agreement as to some of these in light of the Court's rulings yesterday. I assume we should have the benefit of the court's written order by that point, so hopefully that should help as well.**

**Marlene J. Goldenberg • Partner**

**GoldenbergLaw, PLLC**

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**From:** Jessica Heinz <JHeinz@c-wlaw.com>

**Sent:** Thursday, November 21, 2019 12:44 PM

**To:** Marlene Goldenberg  
**Cc:** Valsartan PEC Listserv  
**Subject:** RE: RFP Update

No problem. Will this meet and confer be specific to my clients?

JESSICA M. HEINZ | Partner

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**From:** Marlene Goldenberg [mailto:mjgoldenberglaw.com]

**Sent:** Thursday, November 21, 2019 1:41 PM

**To:** Jessica Heinz

**Cc:** Valsartan PEC Listserv

**Subject:** Re: RFP Update

Yes, thank you for circulating the dial-in, and please do include the PEC listserv.

Thanks again,

Marlene

**Marlene J. Goldenberg • Partner**

**GoldenbergLaw, PLLC**

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**From:** Jessica Heinz <JHeinz@c-wlaw.com>

**Sent:** Thursday, November 21, 2019 12:38 PM

**To:** Marlene Goldenberg

**Cc:** Valsartan PEC Listserv

**Subject:** RE: RFP Update

Hi Marlene,

It was nice to see you too. Wednesday at 2:30 CST/3:30 EST works for me. I can circulate a dial-in. Should I send to the PEC listserv?

Thanks,  
Jessica

JESSICA M. HEINZ | Partner

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**From:** Marlene Goldenberg [mailto:[mjgoldenberg@goldenberglaw.com](mailto:mjgoldenberg@goldenberglaw.com)]

**Sent:** Thursday, November 21, 2019 1:04 PM

**To:** Jessica Heinz

**Cc:** Valsartan PEC Listserv

**Subject:** RFP Update

Jessica,

It was nice to see you yesterday. Assuming the court issues its written order tomorrow, do you have time early next week to talk through our sections of the RFPs again? We both have a lot of briefing to do before December 11th, so I'm hoping we can be proactive and talk through these once more fairly soon.

I have time on Tuesday after 2:00 CST or on Wednesday after 2:30 CST.

Thanks,

Marlene

**Marlene J. Goldenberg • Partner**

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